

# **EXHIBIT B**

**PLAINTIFFS' PROPOSED AGENDA****May 1, 2020 Discovery Conference**

<b>Topic Number</b>	<b>TOPIC</b>	<b>EXISTING DEADLINE</b>	<b>PROPOSED DEADLINE</b>
1.	Identification of custodians	May 1, 2020	May 8, 2020
2.	Reporting structures of all proposed custodians provided (RFP 7)	None	Plaintiffs propose May 5, 2020; FB proposes May 15
3.	Identification of those interviewed by PWC	None	May 5, 2020
4.	Deadline to provide information about where ESI resides	None	May 7, 2020
5.	Documents produced to regulators (RFP 6)	Discussions ongoing	Plaintiffs propose agreement or briefing by May 15, 2020; FB proposes July 3
6.	Documents relating to ADI (RFP 19)	Discussions ongoing	Agreement or briefing by May 15, 2020
7.	Documents relating to value of user data (RFPs 16, 17)	Discussions ongoing	Agreement or briefing by May 22, 2020